

Wessinger-Hill, JoAnne

From: Wessinger-Hill, JoAnne
Sent: Wednesday, September 9, 2020 6:21 PM
To: 'Carrie Schurg'; 'chad.burgess@dominionenergy.com';
'matthew.gissendanner@dominionenergy.com'; Nelson, Jeff; Grube-Lybarker, Carri;
Bateman, Andrew; Edwards, Nanette; 'richard@rlwhitt.law'; Jamey Goldin google;
Weston Adams; J. Blanding Holman; Belton T. Zeigler; 'bguild@mindspring.com';
'klee@selcsc.org'; 'court.walsh@nelsonmullins.com'; 'dori.jaffe@sierraclub.org'; Hall,
Roger; 'bsnowden@kilpatricktownsend.com'
Cc: KENNETH BURGESS; MATTHEW GISSENDANNER; Nelson, Jeff; Grube-Lybarker, Carri;
Bateman, Andrew; Edwards, Nanette; Richard Whitt; Jamey Goldin google; Weston
Adams; J. Blanding Holman; Belton T. Zeigler; bguild@mindspring.com; Kate Lee;
court.walsh@nelsonmullins.com; dori.jaffe@sierraclub.org; Hall, Roger; Ben Snowden
Subject: RE: [External] Docket 2019-226-E (DESC's IRP)

Please let this email serve as acknowledgement of receipt for your email.

Thank you.

Jo Anne Wessinger Hill

Jo Anne Wessinger Hill

C. Jo Anne Wessinger Hill, Esq.
General Counsel to the Commission
Public Service Commission

State of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

www.psc.sc.gov

Email: JoAnne.Hill@psc.sc.gov

803-896-5100 (main) | 803-896-5188 (f) | JoAnne.Hill@psc.sc.gov

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in Docket No. 2019-329-A and shall be published in the docket for this matter. If you have received this communication in error, please immediately notify us by telephone at (803) 896-5100.

From: Carrie Schurg <carrie@rlwhitt.law>
Sent: Wednesday, September 9, 2020 3:57 PM
To: Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov>
Cc: KENNETH BURGESS <chad.burgess@dominionenergy.com>; MATTHEW GISSENDANNER <matthew.gissendanner@dominionenergy.com>; Nelson, Jeff <jnelson@ors.sc.gov>; Grube-Lybarker, Carri <clybarker@scconsumer.gov>; Bateman, Andrew <abateman@ors.sc.gov>; Edwards, Nanette <nedwards@ors.sc.gov>; Richard Whitt <richard@rlwhitt.law>; Jamey Goldin google <jameygoldin@google.com>; Weston Adams <weston.adams@nelsonmullins.com>; J. Blanding Holman <bholman@selcsc.org>; Belton T. Zeigler <belton.zeigler@wbd-us.com>; bguild@mindspring.com; Kate Lee <klee@selcsc.org>; court.walsh@nelsonmullins.com; dori.jaffe@sierraclub.org; Hall, Roger <RHall@scconsumer.gov>; Ben Snowden <bsnowden@kilpatricktownsend.com>
Subject: [External] Docket 2019-226-E (DESC's IRP)

Ms. Wessinger-Hill:

Please see the attached Request/Exhibits, on behalf of the South Carolina Solar Business Alliance, Inc., which has also been e-filed in Docket 2019-226-E, today.

Regards,
Carrie Schurg

Wessinger-Hill, JoAnne

From: Carrie Schurg <carrie@rlwhitt.law>
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To: Wessinger-Hill, JoAnne
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Subject: [External] Docket 2019-226-E (DESC's IRP)
Attachments: Request in 2019.226.E.pdf; DESC 8.4.2020 Request.pdf; Order 8.12.2020.pdf

Ms. Wessinger-Hill:

Please see the attached Request/Exhibits, on behalf of the South Carolina Solar Business Alliance, Inc., which has also been e-filed in Docket 2019-226-E, today.

Regards,
Carrie Schurg

Whitt Law Firm, LLC

ATTORNEYS AND COUNSELORS AT LAW

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR (1996)

"A VETERAN OWNED LAW FIRM"

OF COUNSEL:

RICHARD L. WHITT

JEFFERSON D. GRIFFITH, III

401 WESTERN LANE, SUITE E,
IRMO, SOUTH CAROLINA 29063
MAILING ADDRESS: POST OFFICE BOX 362
IRMO, SOUTH CAROLINA 29063
TELEPHONE: (803) 995-7719

September 9, 2020

VIA, ELECTRONIC FILING AND ELECTRONIC MAILC. Jo Anne Wessinger Hill,
Standing Hearing Officer
The Public Service Commission of South CarolinaRe: • **Docket 2019-226-E (DESC's IRP)**
 • **Request for Extension**

Ms. Wessinger-Hill:

The undersigned represents the South Carolina Solar Business Alliance, Inc., ("SCSBA"), in the above-referenced Docket. Please reference Dominion Energy South Carolina, Incorporated's ("DESC"), email to you, dated August 4, 2020. Also please reference your Directive Order of August 12, 2020, Order 2020-73-H, (both the Request and Order are attached hereto, for your ready-reference).

Our client is in receipt of DESC's Rebuttal Testimony and Exhibits on August 28, 2020. DESC witness Bell's Rebuttal Testimony attaches as an exhibit (EHB-3) a Supplemental IRP that reflects numerous changes to its modeling made in response to the suggestions of ORS, as well as one change requested by SCSBA. As indicated by DESC witness Neely, DESC also increased the number of scenarios it modeled, from 64 in the original IRP to 144 in the supplemental IRP. As a result, in preparing its Surrebuttal testimony SCSBA must review more than twice as much modeling information and data as it had to review in preparing its initial testimony. Given the large volume of information it must now review and analyze, SCSBA requires additional time to respond.

Accordingly, SCSBA hereby requests a two-week extension from the present due date of September 18, 2020, for SCSBA's Surrebuttal Testimony/Exhibits, until and including October 2, 2020. You will recall that SCSBA consented to a two-week extension of time for DESC to file its Rebuttal Testimony/Exhibits and we believe that a concomitant extension for SCSBA, is appropriate. In your Directive Order referenced hereinabove, you referenced "conditions"

2019-226-E
September 9, 2020
Page 2 of 3

between DESC and SCSBA, in an email attached to DESC's request to you, also referenced hereinabove. The pertinent "condition", read as follows, "DESC will agree to any reasonable further extension requested by SCSBA or other parties in order to allow the parties reasonable time to review DESC's updated analysis prior to filing surrebuttal testimony." Therefore, SCSBA's request for an extension of time is both reasonable and appropriate.

Please advise if you require any additional information concerning this request, which is,

Respectfully Submitted,

/s/Richard L. Whitt
Whitt Law Firm, LLC
401 Western Lane, Suite E
Irmo, South Carolina, 29063
(803) 995-7719

Benjamin L. Snowden
Kilpatrick Townsend & Stockton, LLP,
4208 Six Forks Road, Suite 1400
Raleigh, North Carolina 27609
(919) 420-1719

*Both as Counsel for the South Carolina Solar
Business Alliance, Inc.*

September 9, 2020
Irmo, South Carolina

RLW/cas

cc: All parties of record in Docket 2019-226-E, *via electronic mail*

From: Zeigler, Belton <Belton.Zeigler@wbd-us.com>

Sent: Tuesday, August 4, 2020 3:08 PM

To: Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov>

Cc: jnelson@ors.sc.gov; clybarker@scconsumer.gov; abatement@ors.sc.gov; nedwards@ors.sc.gov; richard@rlwhitt.law; jameygoldin@google.com; weston.adams@nelsonmullins.com; Bholman@selcsc.org; bguild@mindspring.com; kleee@selcsc.org; court.walsh@nelsonmullins.com; dori.jaffe@sierrclub.org; BURGESS, KENNETH CHAD (SEG Services - 6) <CHAD.BURGESS@SCANA.COM>; MATTHEW GISSENDANNER (matthew.gissendanner@dominionenergy.com) <matthew.gissendanner@dominionenergy.com>; Mansfield, Kathryn <Kathryn.Mansfield@wbd-us.com>

Subject: Docket No. 2019-226-E, DESC's 2020 IRP: Request for Extension to File Rebuttal and Surrebuttal Testimony

Dear Ms. Wessinger-Hill:

Attached please find a request for an extension of deadlines for filing rebuttal and surrebuttal testimony in this docket and an email setting out the conditions on which the Southern Environmental Law Center, the Coastal Conservation League, Johnson Development Associates, Inc. and the South Carolina Solar Business Alliance have been willing to consent to this request. The ORS has also consented to this request.

Thank you in advance for your consideration of this matter. Please let us know what assistance the parties can provide in determining a new date for the hearing on the merits in this matter.

Sincerely,

Belton Zeigler

Belton Zeigler

Partner

Womble Bond Dickinson (US) LLP

d: 803-454-7720

m: 803-530-1189

e: Belton.Zeigler@wbd-us.com

1221 Main Street

Suite 1600

Columbia, SC 29201



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womblebond Dickinson.com



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SOUTH CAROLINA PUBLIC SERVICE COMMISSION

STANDING HEARING OFFICER DIRECTIVE

DOCKET NO. 2019-226-E ORDER NO. 2020-73-H

AUGUST 12, 2020

C. Jo Anne Wessinger Hill
Standing Hearing Officer

DOCKET DESCRIPTION:

South Carolina Energy Freedom Act (House Bill 3659/2019 Act 62) Proceeding Related to S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Dominion Energy South Carolina, Incorporated

MATTER UNDER CONSIDERATION:

DESC's request for a two-week extension of pre-filing dates for Rebuttal and Surrebuttal Testimony.

STANDING HEARING OFFICER ACTION:

Counsel for Dominion Energy South Carolina, Incorporated (DESC) has requested a two-week extension of the established pre-filing deadlines for Rebuttal and Surrebuttal testimonies and exhibits in this rehearing matter. This request has the consent of the South Carolina Office of Regulatory Staff, the Southern Environmental Law Center, the Coastal Conservation League, and Johnson Development Associates, Inc. The South Carolina Solar Business Alliance (SCSBA) consents to the request with the conditions between DESC and SCSBA regarding discovery, production and analysis contained in the SCSBA email attached to DESC's Request. No other parties responded after all were notified of the request.

Under the proposed scenario, Rebuttal testimony and exhibits would be due on August 28, 2020, and the new deadline for Surrebuttal testimony and exhibits would be September 18, 2020 under the proposal. DESC needs this extension to comply with the requests of ORS and other parties that DESC revise and refile its IRP analyses to address additional scenarios, adjust certain assumptions, and correct certain transcription and formula errors identified during discovery. The revised analyses are being prepared by DESC; yet, DESC maintains that this requires the modeling of approximately 140 individual planning scenarios hour by hour over a forty-year planning horizon and other work to calculate levelized capital costs and to validate and present the results. DESC states that completing these tasks will require an additional two weeks.

The Standing Hearing Officer finds, due to near-unanimous consent and for good cause, that the new deadline for pre-filing Rebuttal testimony and exhibits will be August 28, 2020, and the new deadline for pre-filing Surrebuttal testimony and exhibits will be September 18, 2020. In short, the request is granted.

The amended dates to the existing procedural schedule are as follows:

August 28, 2020	Company (DESC) rebuttal testimony
September 18, 2020	Other parties' surrebuttal testimony

The Clerk's Office is asked to set and post this amended schedule.

Wessinger-Hill, JoAnne

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Subject: Re: [External] Docket 2019-226-E (DESC's IRP)

Thank you.

Sent from my iPhone

On Sep 9, 2020, at 6:21 PM, Wessinger-Hill, JoAnne <JoAnne.Hill@psc.sc.gov> wrote:

Please let this email serve as acknowledgement of receipt for your email.

Thank you.

Jo Anne Wessinger Hill

Jo Anne Wessinger Hill

**C. Jo Anne Wessinger Hill, Esq.
 General Counsel to the Commission
 Public Service Commission**

State of South Carolina
 101 Executive Center Drive, Suite 100
 Columbia, SC 29210

www.psc.sc.gov

Email: JoAnne.Hill@psc.sc.gov

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